

From: Zaragoza, Richard R.
Sent: Thursday, August 20, 2009 3:07 PM
To: Lewis Pulley; Yvonne.Harris@fcc.gov
Cc: Reilly, Christine A.
Subject: KOMU-TV Mid-Term Report

Dear Lew and Yvonne,

I want to thank both of you for the opportunity to respond and clarify matters.

To follow-up on some questions posed by Yvonne, we asked our client, The Curators of the University of Missouri which is the licensee of KOMU-TV, Columbia, MO, to contact, where possible, the persons who were interviewed for the non-internal promotion, station positions that are identified in the two Annual EEO Public File Reports that were submitted with the station's Mid-Term Report. Each of the persons contacted were asked how they heard about the posting at KOMU for which they applied.

The station's Annual EEO Public File Report, covering the period October 1, 2006 - September 30, 2007, shows that 10 positions were filled: 5 through internal promotions/hires and 5 by outside hires. Of the 5 positions filled by outside hires, there were total of 18 interviewees. Notwithstanding the passage of time, the station was able to reach 7 of them. Of the 7 contacted, the MU Job List Website was apparently the "exclusive" referral source for 5 of the interviewees. The station was informed by one of the two interviewees for the TV Anchor position that she was alerted to the job posting by the station's News Director. One of the three interviewees for the Broadcast Electronics Tech I position informed the station that he was alerted to the job posting by a friend whom the person did not name.

The station's Annual EEO Public File Report, covering the period October 1, 2007 - September 30, 2008, shows that 4 positions were filled by outside hires. There were a total of 10 interviewees for the four positions. Notwithstanding the passage of time, the station was able to reach 6 of the 10 interviewees. Of the 6 contacted, the MU Job List Website was apparently the "exclusive" referral source for 4 of the interviewees. The station was informed by one of the four interviewees for the Senior Multimedia Specialist position that he was alerted to the job posting by the MU Job List Website and by word of mouth. Another of the four interviewees said that he learned of the position from the previous occupant of the position and the station's Director of Audience Development.

It is clear from the above that the station fully complied with Section 73.2080(c)(6) by providing, in its Annual EEO Public File Reports, the "referral source" for each hiree as well as the total number of interviewees referred by each recruitment source utilized in connection with the vacancies. The MU Job List Website is a permissible and effective recruitment or referral source for the station. It is not clear from the Commission's rule that a station must probe to find out from each interviewee all of the other possible ways that the interviewee may have learned about the particular job vacancy being applied for.

In any event, the station is in the process of modifying its interview procedures to make sure that the interviewer probes the interviewee in order to try to discover all of the possible recruitment referral sources that might have been involved in the person finding out about the position.

Thank you for your understanding. Please let us know if you have any further questions or need any additional information.

My best,

Dick

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